

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,)	Case No.: 2:15-mj-00380-PAL
)	
Plaintiff,)	
)	
vs.)	STIPULATION TO CONTINUE
)	PRELIMINARY HEARING
)	(First Request)
PERRY SCOTT TORRES,)	
)	
Defendant.)	

IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden, United States Attorney, and Nadia Ahmed, Special Assistant United States Attorney, counsel for the United States of America, and Rachel Korenblat, Assistant Federal Public Defender, counsel for defendant **PERRY SCOTT TORRES**, that the preliminary hearing in the above-captioned matter, currently scheduled for May 19, 2015, at the hour of 4:00 p.m., be vacated and continued for thirty (30) days or to a date and time convenient to the Court.

This stipulation is entered into for the following reasons:

1. The parties seek to resolve this matter through a plea agreement, which would obviate the need for the preliminary hearing. The parties need additional time to negotiate the details of such a resolution.
2. Counsel for the defendant will need additional time to discuss any resolution with the defendant.

3. Defendant is out of custody.

4. Denial of this request for continuance of the preliminary hearing would prejudice both the defendant and the Government and unnecessarily consume this Court's valuable resources, taking into account the exercise of due diligence.

5. Additionally, denial of this request for continuance could result in a miscarriage of justice.

6. The additional time requested by this stipulation is excludable in computing the time within which the defendant must be charged either by Information or Indictment and the trial herein must commence pursuant to the Speedy Trial Act, 18 U.S.C. § 3161(b) and § 3161(h)(8)(A), considering the factors under 18 U.S.C. § 3161(h)(8)(B)(I) and (iv).

7. There have been no previous requests for continuance of the preliminary hearing granted herein.

DATED this 19th day of May, 2015.

Respectfully submitted,

DANIEL G. BOGDEN
United States Attorney

/s/ Rachel Korenblat
RACHEL KORENBLAT
Counsel for defendant
PERRY SCOTT TORRES

/s/ Nadia Ahmed
NADIA AHMED
Special Assistant United States Attorney

UNITED STATES OF AMERICA,)	Case No: 2:15-mj-00380-PAL
)	
Plaintiff,)	
)	ORDER CONTINUING
vs.)	PRELIMINARY HEARING
)	
PERRYNN SCOTT TORRES,)	
)	
Defendant.)	

IT IS HEREBY ORDERED that the preliminary hearing in the above-captioned matter currently scheduled for May 19, 2015, at the hour of 4:00 p.m., be vacated and continued to June 18, 2015, at the hour of 4:00 p.m.

Tygg A. Zeen
UNITED STATES MAGISTRATE JUDGE